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**From:** Reaves, Elissa [Reaves.Elissa@epa.gov]  
**Sent:** 11/21/2022 5:01:40 PM  
**To:** Nguyen, Khue [Nguyen.Khue@epa.gov]; Arrington, Linda [Arrington.Linda@epa.gov]; Bartow, Susan [Bartow.Susan@epa.gov]; Gavin, Quinn [Gavin.Quinn@epa.gov]; Javier, Julie [Javier.Julie@epa.gov]; Britton, Cathryn [Britton.Cathryn@epa.gov]; Friedman, Dana [Friedman.Dana@epa.gov]; Grable, Melissa [Grable.Melissa@epa.gov]; Feitel, Alexandra [feitel.alexandra@epa.gov]; Kiely, Timothy [Kiely.Timothy@epa.gov]; Knorr, Michele [knorr.michele@epa.gov]; Aranda, Amber [aranda.amber@epa.gov]; Reilly-Diakun, Jori [ReillyDiakun.Jori@epa.gov]; Koch, Erin [Koch.Erin@epa.gov]  
**CC:** Biscoe, Melanie [Biscoe.Melanie@epa.gov]  
**Subject:** RE: seed treatment labeling follow up

I can only meet from 11-11:30, I have another meeting at 11:30.

Elissa Reaves, Ph.D.  
Director, Pesticide Re-evaluation Division  
Office of Pesticide Programs  
202-566-1925

-----Original Appointment-----

**From:** Nguyen, Khue <Nguyen.Khue@epa.gov>  
**Sent:** Monday, November 21, 2022 12:00 PM  
**To:** Arrington, Linda; Bartow, Susan; Gavin, Quinn; Javier, Julie; Britton, Cathryn; Friedman, Dana; Grable, Melissa; Feitel, Alexandra; Kiely, Timothy; Reaves, Elissa; Knorr, Michele; Aranda, Amber; Reilly-Diakun, Jori; Koch, Erin  
**Cc:** Biscoe, Melanie  
**Subject:** seed treatment labeling follow up  
**When:** Tuesday, November 22, 2022 11:00 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** Microsoft Teams Meeting

Hi all,

I am working on boilerplate text for the Q4 PIDs to explain the baseline FIFRA eco risk mitigation effort (now renamed FIFRA Interim Ecological Mitigation). A question came up and I need your feedback.

You know how in the ESA workplan update, there's a whole section about treated seed labeling, and we refer to the usual language in PIDs which are basic storage/disposal instructions and other best management practices to reduce exposure to non-targets. Then we mention the seed treatment petition response, the ANPRM, and measures we are not proposing but "considering" such as requiring a dust reducing agent, requiring 2 ft depth for the burying of spilled seed, and amending the terms of registration to require registrants to create disposal plans for treated seed.


See highlighted below for the text I'm referring to. The question is: should these new measures be added for TM/MBC (the only Q4 PID with seed treatments)?

We conferred with OGC recently on this question. Their answer is: only include if there are risks of concern and we can provide rationale for why we are proposing the new mitigation. **Their broader policy question for OPP is: OPP needs to decide whether we want to propose the measures starting now for all seed treatments moving forward, or wait until comments come in on the ESA workplan update before adding the new seed treatment measures.**

Scheduling this meeting so OPP folks can discuss, copying OGC folks as well.

Thanks,  
Khue

# Ex. 5 Deliberative Process (DP)

The latest and greatest of the Q4 PID ESA drop-in boilerplate text is here:  [Q4 PIDs.ESA text Drop ins 11.15.22.docx](#)

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## Microsoft Teams meeting

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